

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Advanced Television Systems	)	MB Dkt. No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	

To: Office of the Secretary

**COMMENTS OF SOUTH CAROLINA EDUCATIONAL TELEVISION COMMISSION**

South Carolina Educational Television Commission ("SCETV"), by its attorneys and pursuant to the Commission's Rules, comments on the above-referenced rulemaking proceeding to amend Section 73.622 of the Rules. SCETV is the licensee of eleven noncommercial educational television stations in the State of South Carolina, including WJPM-TV/DT, Florence, WRET-TV/DT, Spartanburg, WNEH(TV/DT), Greenwood, and WJWJ-TV/DT, Beaufort.

As detailed in the attached Engineering Technical Statements of Kessler and Gehman Associates, Inc., SCETV respectfully requests revisions to the Proposed DTV Table of Allotments Information in Appendix B of the *Seventh Further Notice of Proposed Rulemaking*, FCC 06-150, MB Docket No. 87-268 (Oct. 20, 2006) for the four above-listed stations. In each case, SCETV's pre-election certification filing (FCC Form 381) specified the station's DTV construction permit facility as was authorized at the time the certifications were due to be submitted. Subsequently, SCETV modified each station's DTV construction permit, in order to correct coordinates and, in some cases, antenna systems and power levels. The resulting modifications have now been licensed and result in slightly different facilities and contours then

previously certified. These revised facilities and contours were approved by the FCC at the time of its granting of the respective DTV constructions permit modifications. Accordingly, SCETV seeks revisions to the Table of Allotments information to reflect the actually authorized DTV facilities.

With respect to **WJPM in Florence, SC** (Facility ID 61008), SCETV requests minor changes in the antenna radiation center height above average terrain (to 242.4 meters), effective radiated power (to 45 kW), and coordinates (to 34-16-48 N; 79-44-35 W) indicated in the DTV Table of Allotments information, in order to reflect the station's current DTV license.

With respect to Station **WRET in Spartanburg, SC** (Facility ID 61011), SCETV requests a one-second change in the coordinates (to 34-53-11 N; 81-49-16 W), in order to reflect the station's current DTV license.

With respect to Station **WNEH in Greenwood, SC** (Facility ID 60931), SCETV requests a one-second change in the coordinates (to 34-22-19 N; 82-10-05 W), and a one kW change in effective radiated power (to 49 kW), in order to reflect the station's current DTV license.

With respect to Station **WJWJ in Beaufort, SC** (Facility ID 61007), SCETV requests minor changes in the antenna radiation center height above average terrain (to 364.5 meters) and effective radiated power (to 440 kW), in order to reflect the station's current DTV license.

For the reasons set forth in the attached technical statements, SCETV respectfully submits that these revisions would conform the proposed DTV Table of Allotments with the stations' actual licensed facilities, while permitting SCETV after the end of the DTV transition to operate the station sites as constructed and avoid the creation of service losses.

Respectfully submitted,

SOUTH CAROLINA EDUCATIONAL  
TELEVISION COMMISSION

By: Barry Persh  
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January 25, 2007

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR.  
OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS  
CONSULTING ENGINEERS IN CONNECTION WITH THE SEVENTH FURTHER NOTICE  
OF PROPOSED RULE MAKING REGARDING THE PARAMETERS ASSIGNED IN  
THE PROPOSED DTV TABLE OF ALLOTMENTS FOR THE SOUTH CAROLINA  
EDUCATIONAL TELEVISION COMMISSION POST-TRANSITION DIGITAL  
TELEVISION BROADCAST FACILITY, WJPM-DT CHANNEL \*45, FLORENCE, SC.**

The firm Kessler and Gehman Associates, Inc. was retained by the South Carolina Educational Television Commission (SCETC), Columbia, South Carolina to review the WJPM-DT Channel \*45 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments (TOA) contained in the Seventh Further Notice of Proposed Rule Making (7<sup>th</sup> FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

**Discussion**

SCETC is licensed to operate the WJPM-TV Channel \*33 analog facility with a maximum effective radiated power (ERP) of 646 kW with an antenna height radiation center of 242.4 meters above average terrain (AAT) using a Dielectric model TUF-O4-14/56H-1-T nondirectional antenna (BMLET-20041201ADP). SCETC is also licensed to operate the WJPM-DT Channel \*45 facility with a maximum ERP of 45 kW with an antenna height radiation center of 242.4 meters AAT using a Dielectric model TUF-O4-14/56H-1-T nondirectional antenna (BLEDT-20050324ACE).

The FCC released the 7<sup>th</sup> FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments. In the 7<sup>th</sup> FNPRM, it states that interested parties may file comments on or before January 11, 2007 (extended to January 25<sup>th</sup>) with respect to the proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed

DTV Table, including comments on any inaccuracies or discrepancies. SCETC filed its FCC Form 381 Pre-Election Certification Form on November 2, 2004 certifying that it will operate its post-transition DTV station using its most recent construction permit (BPEDT-20000501AGS) which authorized an ERP of 50 kW using a TCI model 888-8-24-ND nondirectional, top-mount antenna. However, SCETV filed an application on January 04, 2005 requesting authorization to change antenna systems, correct coordinates and increase the antenna height. Accordingly, the FCC granted the application and issued a construction permit for the WJPM-DT facility (BMPEDT-20050104AAY) which is now a license (BLEDT-20050324ACE).

The discrepancy in the proposed DTV TOA is that the certification application requesting to operate its post-transition DTV station as authorized by the 2000 construction permit (BPEDT-20000501AGS) had to be filed on or before the filing window deadline. There was not an opportunity to amend the Pre-Election Certification application to certify that it will operate its post-transition DTV station as authorized by its most recent construction permit (BMPEDT-20050104AAY) and now license (BLEDT-20050324ACE).


Referring to the enclosed Exhibit, it can be seen that the proposed DTV TOA facility's protected F(50,90) 41.6 dBuV/m noise limited contour (blue contour) is slightly different than the licensed facility's F(50,90) 41.6 dBuV/m noise limited contour (red contour). The proposed DTV TOA assigns an ERP of 50 kW; an antenna height radiation center of 238 meters AAT; and the following coordinates: Latitude 34°16'47" N, Longitude 79°44'35' W. The subsequent WJPM-DT construction permit (BMPEDT-20050104AAY) and now license (BLEDT-20050324ACE) authorizes an ERP of 45 kW; an antenna height radiation center of 242.4 meters AAT; and the following coordinates: Latitude 34°16'48" N, Longitude 79°44'35' W. Accordingly, SCETC respectfully requests that the parameters assigned in the proposed DTV TOA reflect the authorized parameters in the existing WJPM-DT license (BLEDT-20050324ACE) for the Final DTV TOA.

**Certification**

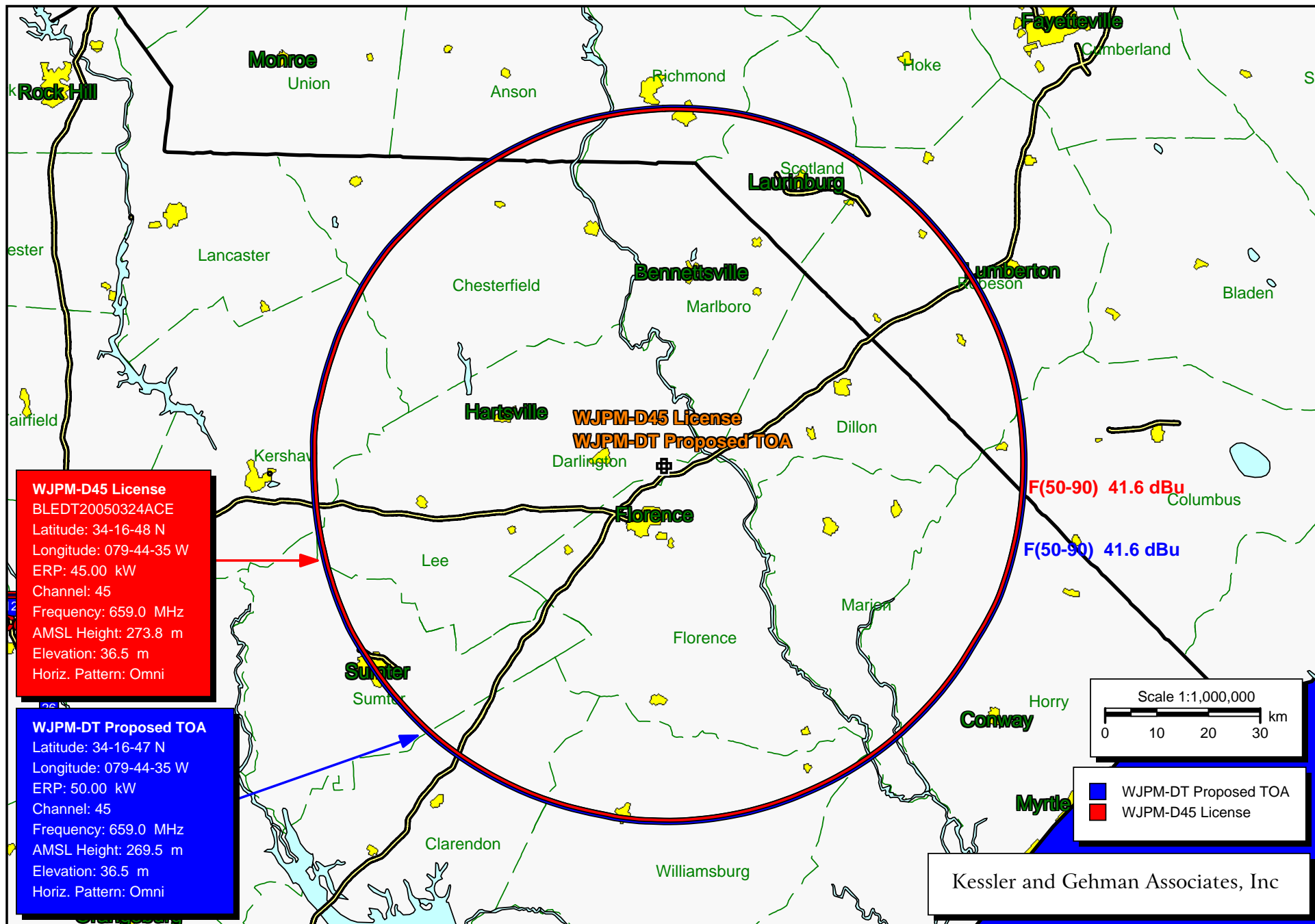
This technical statement was prepared by William T. Godfrey, Jr., Telecommunications Technical Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.



KESSLER AND GEHMAN ASSOCIATES, INC.

  
WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

15 January, 2007



WJPM-DT Proposed DTV Table of Allotments Verification

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR.  
OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS  
CONSULTING ENGINEERS IN CONNECTION WITH THE SEVENTH FURTHER NOTICE  
OF PROPOSED RULE MAKING REGARDING THE PARAMETERS ASSIGNED IN  
THE PROPOSED DTV TABLE OF ALLOTMENTS FOR THE SOUTH CAROLINA  
EDUCATIONAL TELEVISION COMMISSION POST-TRANSITION DIGITAL  
TELEVISION BROADCAST FACILITY, WRET-DT CHANNEL \*43, SPARTANBURG, SC.**

The firm Kessler and Gehman Associates, Inc. was retained by the South Carolina Educational Television Commission (SCETC), Columbia, South Carolina to review the WRET-DT Channel \*43 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments (TOA) contained in the Seventh Further Notice of Proposed Rule Making (7<sup>th</sup> FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

**Discussion**

SCETC is licensed to operate the WRET-TV Channel \*49 analog facility with a maximum effective radiated power (ERP) of 1740 kW with an antenna height radiation center of 296 meters above average terrain (AAT) using An Andrew model 39E5 nondirectional antenna (BLET-19810706KG). SCETC is also licensed to operate the WRET-DT Channel \*43 facility with a maximum ERP of 50 kW with an antenna height radiation center of 302.1 meters AAT using a Dielectric model TUF-O4-14/56H-1-T nondirectional antenna (BLEDT-20050324ACD).

The FCC released the 7<sup>th</sup> FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments. In the 7<sup>th</sup> FNPRM, it states that interested parties may file comments on or before January 11, 2007 (extended to January 25<sup>th</sup>) with respect to the proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed DTV Table, including comments on any inaccuracies or discrepancies. SCETC filed its FCC



Form 381 Pre-Election Certification Form on November 2, 2004 certifying that it will operate its post-transition DTV station using its most recent construction permit (BPEDT-20000501AGP) which authorized an ERP of 50 kW using a TCI model 888-8-32-ND nondirectional, top-mount antenna. However, SCETV filed an application on January 04, 2005 requesting authorization to change antenna systems and correct coordinates. Accordingly, the FCC granted the application and issued a construction permit for the WRET-DT facility (BMPEDT-20050104AAX) which is now a license (BLEDT-20050324ACD).

The discrepancy in the proposed DTV TOA is that the certification application requesting to operate its post-transition DTV station as authorized by the 2000 construction permit (BPEDT-20000501AGP) had to be filed on or before the filing window deadline. There was not an opportunity to amend the Pre-Election Certification application to certify that it will operate its post-transition DTV station as authorized by its most recent construction permit (BMPEDT-20050104AAX) and now license (BLEDT-20050324ACD).

Referring to the enclosed Exhibit, it can be seen that the coordinates assigned in the proposed DTV TOA are slightly different than the licensed facility's coordinates. The proposed DTV TOA assigns the following coordinates: Latitude 34°53'10" N, Longitude 81°49'16" W. The subsequent WRET-DT construction permit (BMPEDT-20050104AAX) and now license (BLEDT-20050324ACD) authorizes the following coordinates: Latitude 34°53'11" N, Longitude 81°49'16" W. Accordingly, SCETC respectfully requests that the parameters assigned in the proposed DTV TOA reflect the authorized parameters in the existing WRET-DT license (BLEDT-20050324ACD) for the Final DTV TOA.

### **Certification**

This technical statement was prepared by William T. Godfrey, Jr., Telecommunications Technical Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and television broadcast consulting since 1998.

***Kessler and Gehman Associates, Inc.***

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Telecommunications Consulting Engineers

He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.



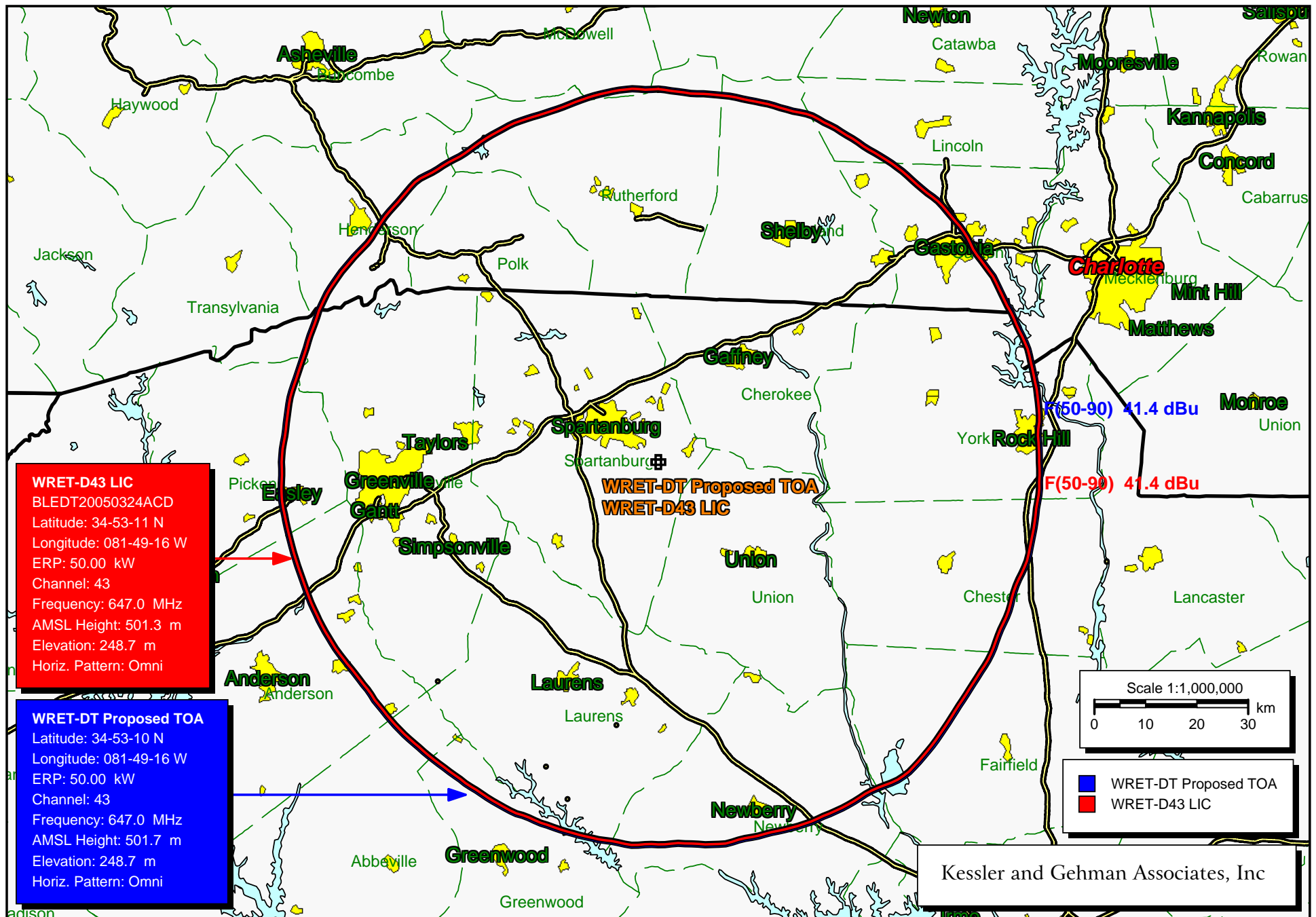
KESSLER AND GEHMAN ASSOCIATES, INC.

A handwritten signature in blue ink that reads 'William T. Godfrey, Jr.'. The signature is written over a horizontal line.

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WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

15 January, 2007



WRET-DT Proposed DTV Table of Allotments Verification

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR.  
OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS  
CONSULTING ENGINEERS IN CONNECTION WITH THE SEVENTH FURTHER NOTICE  
OF PROPOSED RULE MAKING REGARDING THE PARAMETERS ASSIGNED IN  
THE PROPOSED DTV TABLE OF ALLOTMENTS FOR THE SOUTH CAROLINA  
EDUCATIONAL TELEVISION COMMISSION POST-TRANSITION DIGITAL  
TELEVISION BROADCAST FACILITY, WNEH-DT CHANNEL \*18, GREENWOOD, SC.**

The firm Kessler and Gehman Associates, Inc. was retained by the South Carolina Educational Television Commission (SCETC), Columbia, South Carolina to review the WNEH-DT Channel \*18 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments (TOA) contained in the Seventh Further Notice of Proposed Rule Making (7<sup>th</sup> FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

**Discussion**

SCETC is licensed to operate the WNEH-TV Channel \*38 analog facility with a maximum effective radiated power (ERP) of 1225 kW with an antenna height radiation center of 229.8 meters above average terrain (AAT) using a Dielectric model TUF-O4-14/56H-1-T nondirectional antenna (BMLET-20050127AFV). SCETC is also licensed to operate the WNEH-DT Channel \*18 facility with a maximum ERP of 49 kW with an antenna height radiation center of 229.8 meters AAT using a Dielectric model TUF-O4-14/56H-1-T nondirectional antenna (BLEDT-20050322AGH).

The FCC released the 7<sup>th</sup> FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments. In the 7<sup>th</sup> FNPRM, it states that interested parties may file comments on or before January 11, 2007 (extended to January 25<sup>th</sup>) with respect to the proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed

DTV Table, including comments on any inaccuracies or discrepancies. SCETC filed its FCC Form 381 Pre-Election Certification Form on November 2, 2004 certifying that it will operate its post-transition DTV station using its most recent construction permit (BPEDT-20000501AGM) which authorized an ERP of 50 kW using a TCI model 888-8-32-ND nondirectional, top-mount antenna. However, SCETV filed an application on January 14, 2005 requesting authorization to change antenna systems and correct coordinates. Accordingly, the FCC granted the application and issued a construction permit for the WNEH-DT facility (BMPEDT-20050114AAI) which is now a license (BLEDT-20050322AGH).

The discrepancy in the proposed DTV TOA is that the certification application requesting to operate its post-transition DTV station as authorized by the 2000 construction permit (BPEDT-20000501AGM) had to be filed on or before the filing window deadline. There was not an opportunity to amend the Pre-Election Certification application to certify that it will operate its post-transition DTV station as authorized by its most recent construction permit (BMPEDT-20050114AAI) and now license (BLEDT-20050322AGH).


Referring to the enclosed Exhibit, it can be seen that the proposed DTV TOA facility's protected F(50,90) 39.2 dBuV/m noise limited contour (blue contour) is slightly different than the licensed facility's F(50,90) 39.2 dBuV/m noise limited contour (red contour). The proposed DTV TOA assigns an ERP of 50 kW and the following coordinates: Latitude 34°22'19" N, Longitude 82°10'04' W. The subsequent WNEH-DT construction permit (BMPEDT-20050114AAI) and now license (BLEDT-20050322AGH) authorizes an ERP of 49 kW and the following coordinates: Latitude 34°22'19" N, Longitude 82°10'05' W. Accordingly, SCETC respectfully requests that the parameters assigned in the proposed DTV TOA reflect the authorized parameters in the existing WNEH-DT license (BLEDT-20050322AGH) for the Final DTV TOA.

**Certification**

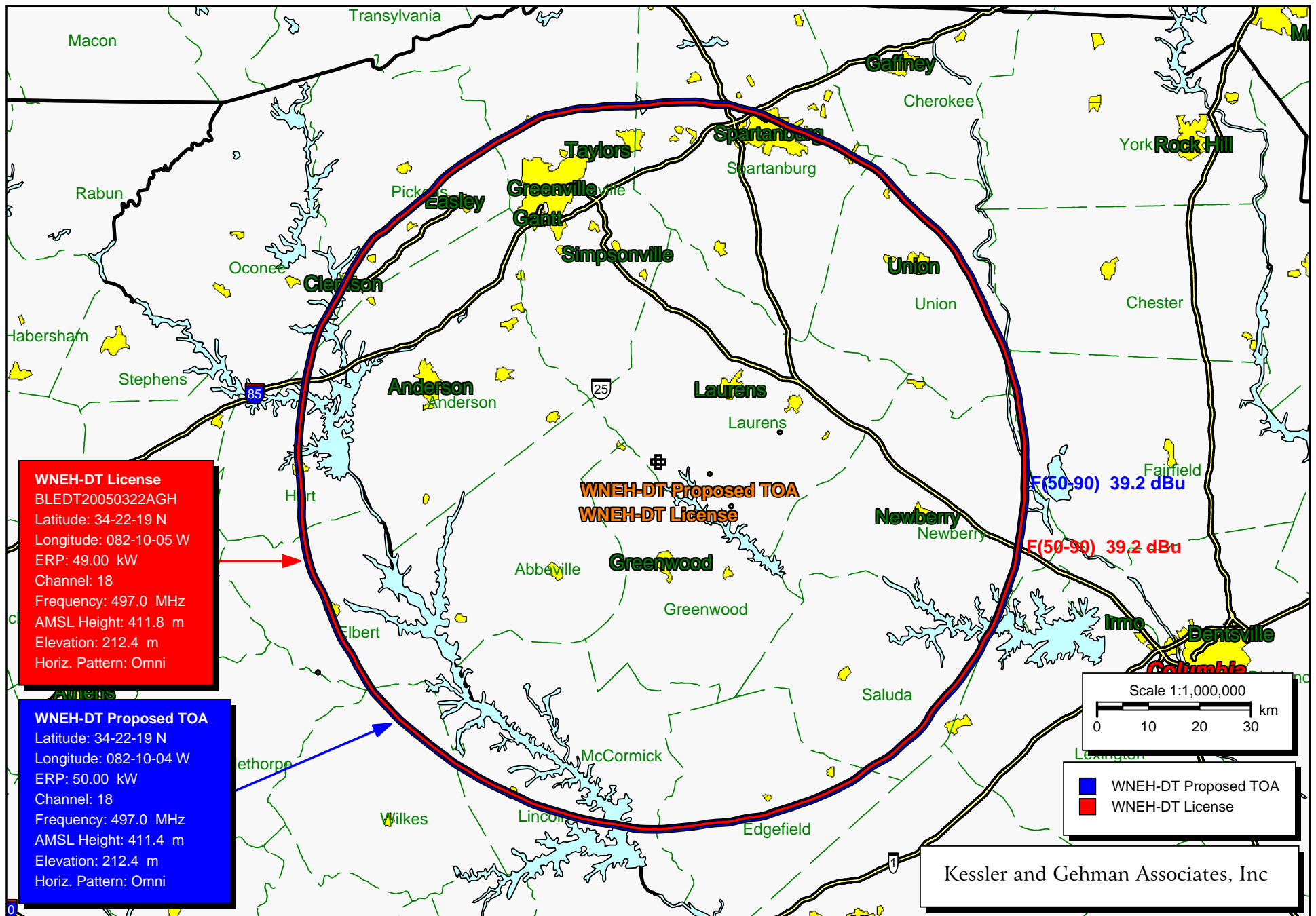
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KESSLER AND GEHMAN ASSOCIATES, INC.

  
WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

15 January, 2007



WNEH-DT Proposed DTV Table of Allotments Verification

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR.  
OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS  
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EDUCATIONAL TELEVISION COMMISSION POST-TRANSITION DIGITAL  
TELEVISION BROADCAST FACILITY, WJWJ-DT CHANNEL \*44, BEAUFORT, SC.**

The firm Kessler and Gehman Associates, Inc. was retained by the South Carolina Educational Television Commission (SCETC), Columbia, South Carolina to review the WJWJ-DT Channel \*44 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments (TOA) contained in the Seventh Further Notice of Proposed Rule Making (7<sup>th</sup> FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

**Discussion**

SCETC is authorized to operate the WJWJ-TV Channel \*16 analog facility with a maximum effective radiated power (ERP) of 2553 kW with an antenna height radiation center of 385.1 meters above average terrain (AAT) using a Dielectric model TUF-C4SP-14/56H-1-T directional antenna (BPET-20041012AIV). SCETC is also authorized to operate the WJWJ-DT Channel \*44 facility with a maximum ERP of 440 kW with an antenna height radiation center of 364.5 meters AAT using a Dielectric model TLP-32E directional antenna (BMPEDT-20050906ACA).

The FCC released the 7<sup>th</sup> FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments. In the 7<sup>th</sup> FNPRM, it states that interested parties may file comments on or before January 11, 2007 (extended to January 25<sup>th</sup>) with respect to the proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed DTV Table,



including comments on any inaccuracies or discrepancies. SCETC filed its FCC Form 381 Pre-Election Certification Form on November 2, 2004 certifying that it will operate its post-transition DTV station as authorized by its most recent construction permit (BMPEDT-20041012AIX); however, it was later determined that the WJWJ tower would not support the top-mount antenna authorized in the construction permit without serious tower upgrades. Therefore, instead of replacing the top-mount NTSC antenna with a broadband antenna that would increase the tower load and wind load, SCETV filed an application on September 6, 2005 requesting authorization to operate with a new Dielectric model TLP-32E directional, side-mount antenna that would be supported by the existing WJWJ tower along with the existing NTSC top-mount antenna without the need for major tower upgrades. Accordingly, the FCC granted the application and issued a construction permit for the WJWJ-DT facility (BMPEDT-20050906ACA).

The discrepancy in the proposed DTV TOA is that the certification application requesting to operate its post-transition DTV station as authorized by the 2004 construction permit (BMPEDT-20041012AIX) had to be filed on or before the filing window deadline which preceded the completion of the structural analysis which concluded that the antenna would cause major tower loading issues. There was not an opportunity to amend the Pre-Election Certification application to certify that it will operate its post-transition DTV station as authorized by its most recent construction permit (BMPEDT-20050906ACA).


Referring to the enclosed Exhibit, it can be seen that the proposed DTV TOA facility's protected F(50,90) 41.5 dBuV/m noise limited contour (black contour) is slightly different than the authorized facility's F(50,90) 41.5 dBuV/m noise limited contour (red contour). The proposed DTV TOA assigns an ERP of 468 kW and an antenna height radiation center of 385 meters AAT. The WJWJ-DT construction permit (BMPEDT-20050906ACA) authorizes an ERP of only 440 kW and an antenna height radiation center of 364.5 meters AAT. Accordingly, SCETC respectfully requests that the parameters assigned in the proposed DTV TOA reflect the authorized parameters in the existing WJWJ-DT construction permit (BMPEDT-20050906ACA) for the Final DTV TOA.

**Certification**

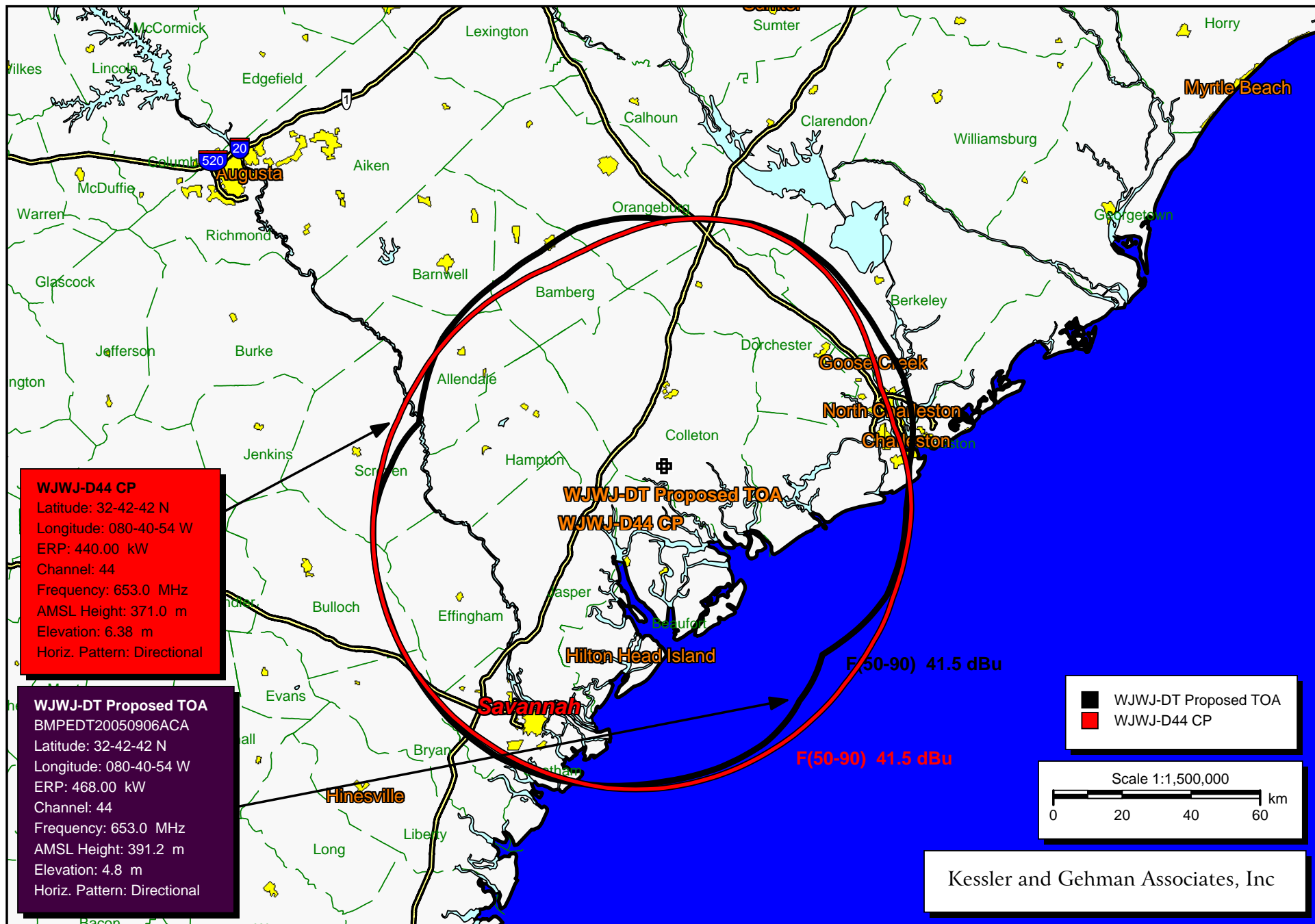
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KESSLER AND GEHMAN ASSOCIATES, INC.

  
WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

12 January, 2007



WJWJ-DT Proposed DTV Table of Allotments Verification